

LG Chem Supplier Code of Conduct

Version 2.0

Introduction

LG Chem, Ltd. (“LG Chem”) aims to become a global chemical company that grows together with society by fulfilling its roles and responsibilities as a member of global society. We strive to provide sustainable solutions that can contribute to resolving social/environmental problems, while endeavoring to adhere to the basic principles of sound business growth.

We have established this Code of Conduct for Suppliers (“Code”) to build sustainable supply chains through compliance with applicable laws and regulations. We require all of LG Chem’s suppliers (referred to individually as the “Supplier” and collectively “Suppliers”) to establish operating standards in human rights, labor, health, safety, environment, responsible sourcing of minerals, ethics, and management system. All Suppliers shall adhere to this Code and ensure all of their direct or indirect sup-suppliers are compliant with the Code.

LG Chem or third-party auditors appointed by LG Chem may audit Supplier’s compliance with this Code. LG Chem may require the Supplier to make corrective action plans and implement improvement measures if any risk is found in the course of such due diligence audit. If major failures are not remedied within a timeline set by LG Chem, LG Chem may suspend or terminate the contract with the Supplier. Details of the process are described hereafter.

This Code is referring the Responsible Business Alliance (RBA) Code of Conduct, the UN Guiding Principles on Business and Human Rights (UNGPs) and OECD Guidelines for Multinational Enterprises.

LG Chem reserves the right to revise this Code at anytime by LG Chem according to changes to LG Chem’s rules and regulations regarding relationships with Suppliers. If there are any conflicts between the Code and any relevant local laws and regulations, the higher standards shall prevail.

1. Human Rights and Labor

Suppliers must commit to uphold the human rights of its workforces (“workers”), and to treat them with dignity and respect as understood by international community.

1.1 Forced Labor

All work must be voluntary. Forced, bonded (including debt and bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not be permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction of fraud for labor or services.

There shall be no unreasonable restrictions on workers’ freedom of movement in the facility in addition to unreasonable restrictions on entering or existing company provided facilities.

All workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment and shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker’s contract.

Employers (including agents and sub-agents) shall not hold or otherwise destroy, conceal or confiscate identity or immigration documents such as government-issued identification, passports or work permits and also shall not require workers to pay recruitment fees for their employment.

1.2 Child Labor

Child labor must not be used in any stage of manufacturing. The term “Child labor” is defined under local laws and regulations or, in any case, under the age of 15.

Young workers under the age of 18 shall not perform work that is likely jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance in accordance with applicable laws and regulations.

1.3 Working Hours

Working hours are not to exceed the maximum set by local law, including any legal exception. Maximum working hours per week must be in accordance with local laws. All workers shall be allowed at least one day off every seven days.

1.4 Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement.

1.5 Humane Treatment

There is to be no harsh or inhumane treatment including violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

1.6 Non-Discrimination

Suppliers shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion,

political affiliation, union membership or marital status in hiring and employment practices such as wages, promotions, reward and access to training. Workers shall be provided with reasonable accommodation for religious practices upon their requests.

1.7 Freedom of Association

In conformance with local laws, suppliers shall respect the right of all workers to form and join trade unions of their own choice, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

2. Health and Safety

Suppliers shall identify all risk factors related to health and safety in advance and take preventive measures accordingly, obtain relevant permits, maintain the latest status, and establish a system to minimize damage by implementing emergency response procedures.

Suppliers shall provide appropriate personal protective equipment to workers to minimize exposure to chemical, biological, and physical agents and ensure that workers can cope with risks through health and safety education.

Suppliers also shall provide clean work facilities for all workers, and establish a system that workers can freely raise issues related health and safety without any fear of retaliation.

2.1 Occupational Safety

Workers' potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, electric shock, and fall hazards) are to be identified, assessed, and mitigated using the Controls, which includes substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safety work procedures (including lockout/tagout), and Supplier shall provide ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate personal protective equipment, and educational materials about risk to them associated with these hazards.

Reasonable steps must also be taken to remove pregnant women and nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments and provide reasonable accommodations for nursing mothers.

2.2 Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact shall be minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress and adequate exit facilities and recovery plans.

2.3 Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes and facilitate the return of workers to work. Furthermore, Suppliers shall conduct process improvement, have workers stretch/to take proper break, and have appropriate staffing to prevent occupational injury and illness. Suppliers also shall have workers to take medical examinations in the manner required by law. Appropriate measures, such as reexamination, process improvement, working hours reduction, and job rotation must be taken depending on the results.

2.4 Industrial Hygiene

Worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled through regular work environment measurements. Those identified agents should be

eliminated or reduced by appropriate process improvements and technical and administrative controls depending on the degree.

When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate personal protective equipment. Protective programs shall include educational materials about the risk associated with these hazards.

2.5 Physically Demanding Work

Worker exposure to hazards of physically demanding tasks including heavy lifting and highly repetitive tasks is to be identified, evaluated, and controlled. Appropriate measures should be implemented such as process improvement, job circulation, and workplace stretching to prevent musculoskeletal disorders from occurring.

2.6 Machine Safeguarding

Suppliers shall conduct safety inspections of all hazardous and dangerous facilities regularly and record them in accordance with applicable laws and regulations. For the safety of workers, suppliers shall provide physical guards and install barriers and safety devices (e.g. interlock the guard that the machine cannot start before the guard is closed and cannot be opened while the machine is still moving) and maintain physical guards, barriers and safety devices in good condition.

2.7 Sanitation, Food and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage and eating facilities. Worker dormitories provided by the suppliers or a labor agent are to be maintained to be clean and safe, and provided with adequate lighting and heat and ventilation, appropriate emergency egress, individually secured accommodations for storing personal items, and reasonable personal space.

2.8 Health and Safety Communication

Suppliers shall provide workers with appropriate health and safety information and training in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire and physical hazards. Health and safety training is provided to all workers regularly with the contents required by relevant laws and regulations. Workers shall be encouraged to raise any health and safety concerns without retaliation. Health and safety information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers.

3. Environment

Suppliers shall obtain all necessary environmental permits, mitigate the negative impact on the community and actively comply with laws and LG Chem's requirements related to hazardous substances, wastes, wastewater, greenhouse gases, and air emissions generated in the manufacturing process. The following rules mainly apply to Supplier with production facilities, while Supplier without production facilities shall apply those rules where reasonably possible.

3.1 Environmental Permits and Reporting

All required environmental permits, approvals, and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

3.2 Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production; maintenance and facility processes; or by other means.

The use of natural resources, including water, fossil fuels, minerals and virgin forest products is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

3.3 Hazardous Substances

Chemicals, waste and other materials posing a hazard to humans or to the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or re-use and disposal.

3.4 Solid Waste

Suppliers shall implement a systematic approach to identify, manage, reduce and responsibly dispose of or recycle solid waste (non-hazardous).

3.5 Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion by products generated from operations are to be characterized, routinely monitored, controlled and treated as require prior to discharge according to local laws and regulations. Suppliers shall conduct routine monitoring of the performance of its air emissions control systems.

3.6 Materials Restrictions

Suppliers are to adhere to all applicable laws, public or administrative regulations, and LG Chem's Guideline for Eco-friendly Supply Chain Management regarding the prohibition or restriction of specific substances, including labeling for recycling and disposal.

3.7 Water Management

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; controls channels of contamination.

All wastewater is to be characterized, monitored, controlled and treated as required to prior to discharge or disposal.

Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and

containment systems to ensure optimal performance and regulatory compliance.

3.8 Energy Consumption and Greenhouse Gas Emissions

Suppliers are to establish a corporate-wide greenhouse gas reduction goal. Corporate/plant-wide energy consumption and all relevant greenhouse gas emissions are to be calculated, documented, and monitored against the greenhouse gas reduction goal.

Suppliers are to look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions, and shall cooperate to widen the use of renewable energy in the manufacture of products for LG Chem.

3.9 Product Life Cycle Assessment

Upon LG Chem's request, suppliers shall conduct a life cycle assessment related to production, product and transportation, and provide environmental data supporting the assessment.

4. Responsible Sourcing of Minerals

Suppliers shall establish policies and conduct due diligence on Relevant Minerals (as defined in Appendix 1) in the manufacturing process in accordance with OECD guidelines or equivalent recognized due diligence standards for responsible supply chains of minerals from conflict-affected and high-risk areas.

4.1 Prohibition of Use of Unethical Minerals

Suppliers shall prohibit the use of the Relevant Minerals sourced through any illegal, unethical, or improper processes which result in human rights abuses, severe health and safety risks, and environmental harm, including water depletion and consumption, waste, and pollution.

4.2 Upstream Supply Chain Management

Suppliers shall procure Relevant Minerals solely from suppliers approved by LG Chem, and shall not alter their sub-tier suppliers in upstream supply chain without LG Chem's prior written consent. Suppliers shall provide LG Chem with necessary assistance and information reasonably needed by LG Chem to evaluate new sub-tier suppliers that the Company wishes to use in its supply chain for manufacture of products for LG Chem.

4.3 Supply Chain of Minerals Assessment and Management

Suppliers shall identify, address and mitigate any risks in its supply chain related to the mining and processing of the Relevant Minerals. Suppliers shall develop and execute due diligence policy and system measures of the origin and chain of custody on Relevant Minerals from conflict-affected and high-risk areas defined in Appendix 1 in accordance with all applicable laws and international industry standards including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Guidance") as further described in Appendix 1, and actively cooperate with LG Chem's due diligence in accordance with the sustainability standards required by LG Chem regarding human rights, environment, health and safety ("Sustainability Standards").

Suppliers shall avoid using Relevant Minerals from smelters or refineries that do not meet the requirements of the OECD Guidance, and shall order its subcontractors to act accordingly. Suppliers shall ensure that its suppliers of Relevant Minerals follow the OECD Guidance and the Sustainability Standards, and shall demonstrate such compliance upon LG Chem's request.

Suppliers shall provide information related to its due diligence in accordance with the OECD Guidance and LG Chem's reporting processes and requirements.

4.4 Responsibility to Procurement of Minerals

Suppliers shall be liable for all direct and indirect damages incurred by LG Chem due to non-compliance of this Section (Responsible Sourcing of Minerals), and implement appropriate corrective actions within a reasonable timeframe, so as to remedy the violation and to prevent similar future occurrence. The corrective actions shall include alternative sourcing or mineral substitution.

5. Ethics

Suppliers shall conduct all business relationships ethically. LG Chem strictly prohibits all forms of corruption, such as improper advantage and bribery and Suppliers shall adhere to all applicable laws and regulations related to anti-corruption in their business activities. In addition, Suppliers shall protect whistleblowers, intellectual property rights, confidential business information, and personal information.

5.1 Business Integrity and No Improper Advantage

In accordance with LG Chem's Jeong-Do Management policy, bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. LG Chem requests its Supplier to respect the Jeong-Do principles in business operations with LG Chem group as well as with other third parties.

Suppliers shall implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws. Furthermore, Suppliers shall not engage in acts that hinder the transaction order, such as unfair trading practices, and shall comply with laws and regulations related to fair trade.

5.2 Disclosure of Information, Documentation

All business dealings should be transparently performed and accurately reflected on the Suppliers' business books and records. Information regarding Suppliers' labor, human rights, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. The Supplier shall maintain documents and records of all identified risks and the actions taken to follow up on such risks.

5.3 Protection of Identity and Non-Retaliation

Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation. Suppliers shall operate programs that ensure confidentiality, anonymity and protection of supplier and employee whistleblowers.

5.4 Intellectual Property

Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

5.5 Protection of Confidential Business Information

Suppliers shall keep and manage all information with economic value, such as business, technical, management, business secrets, and other information acquired in their business with LG Chem. Any information that is related to LG Chem shall not be provided or divulged to a third party or used for personal or improper purposes.

5.6 Privacy

Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone that do business with, including suppliers, customers, consumers and employees. Suppliers are to comply with privacy, data protection and information security laws and regulatory requirements

when personal information is collected, stored, processed, transmitted and shared.

6. Management System

Suppliers shall establish a management system with a scope that is related to comply with applicable laws, regulations and customer requirements including environment, human rights and labor, health, safety and ethics issues.

6.1 Company Commitment

A corporate social and environmental responsibility policy statement affirming the Supplier's commitment to compliance and continual improvement, endorsed by executive management, and posted in all facilities in the local language is required from LG Chem's suppliers.

6.2 Management Accountability and Responsibility

The Supplier clearly identifies company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

6.3 Legal and Customer Requirements

The Supplier shall establish and operate a process to identify, monitor and understand applicable laws, regulations and customer requirements including the requirements of this Code.

6.4 Risk Assessment and Management

Suppliers shall establish and operate a process to identify the legal compliance, environmental, health and safety, human rights and labor risks associated with supplier's operations.

6.5 Improvement Objectives

Written performance objectives, targets and implementation plans to improve the Supplier's social, environmental and health and safety performance, including a periodic assessment of Supplier's performance in achieving those objectives.

6.6 Training

The Supplier shall operate training programs for manager and workers to implement Supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

6.7 Communication

The Supplier shall establish and operate a process of communicating clear and accurate information about Supplier's policies, practices and performance to workers, suppliers and customers.

6.8 Worker Feedback, Participation and Grievance

Suppliers shall operate an effective grievance mechanism to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and foster continuous improvement.

6.9 Audits and Assessments

The Supplier shall conduct a periodic self-assessment to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and

environmental responsibility.

6.10 Corrective Action Process

The Supplier shall establish and operate a process of timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews. The Supplier shall immediately notify LG Chem in writing if it becomes aware of any violation of this Code.

6.11 Documentation and Records

The Suppliers shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

6.12 Supplier Responsibility

The Suppliers shall establish and operate a process to communicate the requirements of this Code to its suppliers and to monitor sub-supplier's compliance to this Code.

Appendix 1: Due Diligence Policy

1. Due Diligence Target

Relevant Minerals	Conflict minerals (i.e., tin, tantalum, tungsten, gold), minerals used in manufacturing lithium-ion batteries, such as cobalt, nickel, lithium, manganese, graphite, and other minerals or materials, which may be added by request of LG Chem's customers, mined in conflict -affected and high-risk areas
Conflict-Affected Areas	Democratic Republic of the Congo, Sudan, Rwanda, Burundi, Uganda, Congo, Zambia, Angola, Tanzania, Central African Republic
High-Risk Areas	Areas of environmental harms, health and safety risks, political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence

2. Due Diligence Standard

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- All applicable laws and international industry standards
- LG Chem's requirements with respect to the scope and methodology of audit and assessment

[OECD Due Diligence Guidance for the Relevant Minerals– 5 Steps Frame]

No.	Steps	Contents
1	Establish strong company management system	<ul style="list-style-type: none"> • Establish due diligence policy and management system (Ref : OECD Guidance Annex II) <ul style="list-style-type: none"> - Risk identification - Risk prevention and mitigation - Third-party verifications or audits of supply chain due diligence - Mechanism for reporting applicable risks • Have due diligence policy in place consistent with OECD Guidance and this Code, to improve transparency and traceability, and continuously work with implementing developments that improve the integrity of the information related to the transparency and traceability • Communication of due diligence policy with stakeholders, including suppliers (Relevant provisions included in the contract) • Supply chain history management
2	Identify and assess risks in supply chain	<ul style="list-style-type: none"> • Identify risks in supply chain <ul style="list-style-type: none"> - At least annually, or additionally as requested by LG Chem. - Supply chain mapping should include identification and location information with respect to subcontractors and suppliers associated with Relevant Minerals, and the country of origin of all Relevant Minerals • Assess risks of suppliers based on OECD Guidance Annex II <ul style="list-style-type: none"> - Review and investigate identified and prioritized risks received from LG Chem and any other resources - Gather information in connection with risk mapping as may be requested by LG Chem
3	Design and implement strategy to respond to identified risks	<ul style="list-style-type: none"> • Devise and adopt risk management plan identified in the ‘Identify and assess risk in supply chain’ phase <ul style="list-style-type: none"> - Resolve reporting gaps in risk assessments - Directly or indirectly request that applicable supply chain actors take prevention, mitigation, and resolution actions - Terminate relationships with supply chain actors that are unwilling to engage in necessary supply chain and risk mapping, resolutions of high risks, and verifications or audits • Report findings of the supply chain risk assessment and risk management plan to the designated senior management of the Company
4	Carry out supply chain due diligence at identified points in the supply chain	<ul style="list-style-type: none"> • Due diligence based on OECD Due Diligence Guidance (Conduct independent third-party audit) <ul style="list-style-type: none"> - Participate in and complete third-party verifications or audits of applicable risks - Provide clear guidance on intended improvements to risk management - Remain actively involved in the preparation and remediation of identified verification or audit gaps - Make progress towards third-party verification or audit within a reasonable time as requested by LG Chem
5	Report on	<ul style="list-style-type: none"> • Publicly report on supply chain due diligence results in accordance with the

	supply chain due diligence	<p>OECD Guidance (through sustainability management report, annual report, etc.)</p> <ul style="list-style-type: none">• Provide supply chain mapping information to LG Chem or to a recognized third party to aggregate reporting across the mineral supply chain• Report any significant changes, and/or new information affecting previously provided information
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Appendix2: References for the LG Chem Code of Conduct for Supplier

The following standards were used in referencing this LG Chem Code of Conduct for Supplier, on which additional information can be found at the sites listed:

RBA Code

<http://www.responsiblebusiness.org/code-of-conduct/>

ILO International Labor Standards

www.ilo.org/global/standards/lang-en/index.htm

ISO 14001

www.iso.org

OECD Guidelines for Multinational Enterprises

www.oecd.org

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

<http://www.oecd.org/investment/mne/mining.htm>

SA8000 and SAI (Social Accountability International)

<http://www.sa-intl.org/>

United Nations Global Compact

www.unglobalcompact.org

Universal Declaration of Human Rights

www.un.org/Overview/rights.html

United Nations Guiding Principles on Business and Human Rights (UNGPs)

<https://www.undp.org/laopdr/publications/guiding-principles-business-and-human-rights>

Version History

Version	1.0	2016	Enactment of Suppliers Code of Conduct
	1.1	April 2020	Partial amendment to the code
	2.0	March 2023	Partial amendment to the code